

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

HEATHER WATTS,

Plaintiff,

V.

HOSPITALITY VENTURES, LLC,

Defendant.

)
)
)
)
)
)
)
)
)
)

CASE NO. 2:06-cv-1149-MEF

DEFENDANT'S EXHIBIT AND WITNESS LIST

Witness List:

NAME	ADDRESS	TELEPHONE NUMBER	EXPECTATION
Roger Miller	May be contacted through Defendant's Counsel	May be contacted through Defendant's Counsel	Witness will be presented
Todd Epplin	5155 Isla Key Blvd. Unit 405 St. Petersburg, FL 33715	(813) 787-4605	Witness will be presented
Amrita Parekh	4283 Spring House Ln. Norcross, GA 30092	(770)446-5418	Witness may be called if need arises
Tandi Mitchell	Address Unknown	(334)567-5453	Witness may be called if need arises
Tammy Dominguez	114 Fox Run Drive Brunswick, GA 31525	(912) 506-2718	Witness will be presented
Carol Twardoch	May be contacted through Defendant's Counsel	May be contacted through Defendant's Counsel	Witness will be presented
Karen Kisch	May be contacted through Defendant's Counsel	May be contacted through Defendant's Counsel	Witness will be presented
Heather Watts			Witness will be presented

Exhibit List:

- DX1. Email from Roger Miller to Plaintiff (10/31/05)
- DX2. Position Statement filed by Montgomery Ventures, LLC
- DX3. Email from Roger Miller to Plaintiff (8/2/05)
- DX4. Personnel Action form for Jennifer Middleton (1/09/06)
- DX5. Email from Roger Miller to Plaintiff Ventures (6/18/04)
- DX6. Affidavit of Plaintiff including handwritten notes by Ms. Watts (12/08/05)
- DX7. Notes Plaintiff wrote during deposition
- DX8. Associate handbook acknowledgement form signed by Plaintiff
- DX9. Hospitality Ventures Management, Inc. Associate Handbook
- DX10. Alabama Department of Industrial Relations Unemployment Compensation Division's Doctor's Certificate for Plaintiff (11/22/05)
- DX11. Plaintiff's 2003 W-2 and other tax documents
- DX12. Plaintiff's 2005 W-2 and other tax documents
- DX13. Plaintiff's 2006 W-2 and other tax documents
- DX14. Plaintiff's pay records from Montgomery Ventures
- DX15. Email from Plaintiff to Roger Miller (4/07/05)
- DX16. Email from Roger Miller to Plaintiff (4/07/05)
- DX17. Email from plaintiff to Megean Carter (7/20/05)
- DX18. Email from Plaintiff to Todd Epplin (8/16/05)
- DX19. Email from Plaintiff to Roger Miller (8/21/05)
- DX20. Email from Plaintiff to Tammy Dominguez (8/29/05)

DX21. Email from Plaintiff to Roger Miller (9/22/05)

DX22. Email from Roger Miller to Plaintiff (9/22/05)

DX23. Email from Roger Miller to Heather Watts (9/22/05)

DX24. Email from Heather Watts to Tammy Dominguez & Roger Miller (9/23/05)

DX25. Email from Plaintiff to Tammy Dominguez (9/27/05)

DX26. Email from Plaintiff to Roger Miller (11/03/05)

DX27. Email from Tammy Dominguez to Plaintiff attaching return to work letter (11/07/05)

DX28. Certification of Certificate of Formation of Hospitality Ventures, LLC from Delaware Secretary of State (7/9/07)

DX29. Certificates of Formation of Hospitality Ventures, LLC

DX30. Cancellation certification of Hospitality Ventures, LLC from Delaware Secretary of State (7/9/07)

DX31. Affidavit of Plaintiff (10/2/07)

This 23rd day of January, 2008.

Respectfully submitted,

Jeffrey A. Lee
Maynard, Cooper & Gale, P.C.
1901 Sixth Avenue North
2400 AmSouth/Harbert Plaza
Birmingham, Alabama 35203-2618
Telephone: (205) 254-1987
Fax: (205) 254-1999

s/ R. Jason D'Cruz
R. Jason D'Cruz
Admitted Pro Hac Vice
Morris, Manning & Martin, LLP
1600 Atlanta Financial Center

3343 Peachtree Road, N.E.
Atlanta, Georgia 30326-1044
Telephone: (404) 233-7000
Fax: (404) 365-9532

Attorneys for Hospitality Ventures, LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
MONTGOMERY DIVISION

Heather Watts,)	
)	
Plaintiff,)	
)	
v.)	CASE NO. 2:06CV1149-MEF
)	
Hospitality Ventures, LLC,)	
)	
Defendant.)	

CERTIFICATE OF SERVICE

I certify that this day I electronically filed the foregoing “Defendant’s Exhibit and Witness List” with the Clerk of the Court using the CM/ECF system, which will notify:

Priscilla Black Duncan
P.B. Duncan & Associates
472 S. Lawrence, Suite 204
Montgomery, AL 36104
helzphar@mindspring.com

Alicia K. Haynes
Haynes & Haynes, P.C.
1600 Woodmere Drive
Birmingham, Alabama 35226
akhaynes@haynes-haynes.com

This 23rd day of January, 2008.

s/ R. Jason D’Cruz
Attorney for Hospitality Ventures, LLC